



U.S. EPA Region 3

402(c)/406(b) INSPECTION CHECKLIST

RENOVATION REPAIR AND PAINTING RULE/ PRE-RENOVATION EDUCATION RULE

Date:

12-17-15

Inspector:

SAMOLIS

Accompanied by:

I. Inspection Type:

☒ Tip/Complaint ☐ TSCA Neutral ☐ Work Practice ☐ Other _____

II. Inspection Entry/Opening Conference

- ☒ 1) Presented EPA Credentials Upon Entering, explained purpose and asked for person in charge.
- ☒ 2) Presented EPA Credentials to Person in Charge and Explained purpose and scope of inspection.
- ☒ 3) Notice of Inspection (NOI) signed by EPA official, presented to person in charge and signed.
- ☐ 4) Notice of Consent by homeowner signed by EPA official, presented to homeowner and signed.
- ☒ 5) TSCA Inspection Confidentiality Notice (CBI) explained and signed by person in charge.

Facility Information (Company or Target)

Name/Address:

GARY BENTZ

Phone No(s):

Email:

Fax No(s):

Owner(s) Name/Title/Address&Phone (if different):

Certified Renovator(s) Name/Title/Address&Phone (if different):

Other Key People (ie Certified Renovators, Workers, Office Manager):

Who has Authorization to sign renovation contracts:

NO contracts did
own work

III. File Review

IV. Additional Information to Collect from the Facility

✓ 1) Explained that only files of renovations performed on properties built before 1978, need to be examined. *NONE*

✓ 2) Explained that only jobs disturbing more than 6sq/ft per room interior or 20 sq/ft exterior, need to be examined.

✓ 3) Determined that no exceptions are present such as emergency renovations, lead abatement, certified lead free housing, 0-bedroom dwellings, elderly or disabled housing, or post 1978 housing.

✓ 4) Requested access to the files for random selection of files for review. *NONE*

✓ 5) Determine the Number of files to review. (Refer to chart based on total number of pre-1978 renovations conducted per year) Number of Files Collected: *1*
HAND WRITTEN DESCRIPTION

✓ 6) Requested work practice checklists for each contract collected. *NONE*

✓ 7) Requested receipt for "Renovate Right" pamphlet for each contract collected. *NONE*

✓ 8) Requested information to determine whether children were present at any of the renovations for the contracts collected. *NONE*

✓ 1) Copies of firm certification and renovator certification. A list of all certified renovators and workers and documentation of training provided to workers. *NONE*

✓ 2) Copies of subcontractor certifications if applicable. *NONE*

✓ 3) The number of renovations performed annually on pre-1978 properties.

✓ 4) The year built of the buildings for all properties renovated by the firm.

✓ 5) A list of owners and/or occupants for all renovations.

✓ 6) Copies of renovation contracts, documentation that "Renovate Right" pamphlet was provided, documentation of lead-safe work practices, post-renovation cleaning verification, dust sampling reports, and any other related information for the renovations performed by the firm. *NONE*

✓ 7) Number of employees of firm and annual sales. *NONE 100,000*

IV. Post inspection Closing Conference (To be conducted at conclusion of inspection)

Company official present: *GARY + CONSTANCE BENTZ*

members
Title *OWNER*

Was the Company Official provided with copies of:

✓ 1) Receipt for Documents.

✓ 2) Copy of Notice of Inspection (NOI) and TSCA Inspection Confidentiality (CBI) Notice

✓ 3) Compliance Assistance Information.



U.S. EPA Region 3

ADDITIONAL INSPECTION QUESTIONS

RENOVATION REPAIR AND PAINTING RULE/ PRE-RENOVATION EDUCATION RULE

The following questions are to be asked during the inspection. Please note the renovator's response to each question.

DID YOU, THE RENOVATOR:

- Yes ☒ No ☐ N/A Obtain firm certification
- Yes ☒ No ☐ N/A Obtain renovator certification
- Yes ☒ No ☐ N/A Provide training to workers
- Yes ☒ No ☐ N/A Provide copies of renovator and dust sampling technician qualifications (training certificate, certifications)
- Yes ☒ No ☐ N/A Post warning signs at entrance to work area
- Yes ☒ No ☐ N/A Follow work practice standards as outlined in §745.85:
- Yes ☒ No ☐ N/A Contain the work area to prevent the spread of dust and debris
 - Yes ☒ No ☐ N/A Cover or remove all objects in the work area (interior)
 - Yes ☒ No ☐ N/A Close or cover all HVAC ducts in the work area (interior)
 - Yes ☒ No ☐ N/A Close all windows in the work area (interior)
 - Yes ☒ No ☐ N/A Close and seal all doors in the work area (interior)
 - Yes ☒ No ☐ N/A Cover doors that must be used in the work area to allow passage but prevent spread of dust
 - Yes ☒ No ☐ N/A Cover floors in the work area with plastic (interior)
 - Yes ☒ No ☐ N/A Close all windows in and within 20ft. of the work area (exterior)
 - Yes ☒ No ☐ N/A Close all doors in and within 20ft. of the work area (exterior)
 - Yes ☒ No ☐ N/A Cover ground extending 10 ft. from work area with plastic, and anchor plastic (exterior)
 - Yes ☒ No ☐ N/A Install vertical containment if necessary (exterior)
- Yes ☒ No ☐ N/A Contain waste on-site and while being transported off site
- Yes ☒ No ☐ N/A Clean work site after renovation
- Yes ☒ No ☐ N/A Remove all paint chips and debris, and mist protective plastic for removal
- Yes ☒ No ☐ N/A Clean work area surfaces and objects using HEPA vacuum and /or wet cloths
- Yes ☒ No ☐ N/A Have certified renovator perform post-renovation cleaning verification
- Yes ☒ No ☐ N/A Provide dust clearance sampling if dust clearance testing was performed
- Yes ☒ No ☐ N/A Provide "Renovate Right" pamphlet
- Yes ☒ No ☐ N/A Affirm receipt of "Renovate Right" pamphlet
- Yes ☒ No ☐ N/A Retain records and attachments for three years

Additional Comments:

DIDN'T KNOW ANYTHING ABOUT RRP

Inspector Signature:

Mark Samuels

Date:

12-11-15